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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 LUZ AQUINO,
20 Plaintiff,
21 vs.
22 PNC MORTGAGE; CLEAR RECON CORP.,
23 Defendants.

24 Case No. 2:15-cv-00068-GMN-GWF

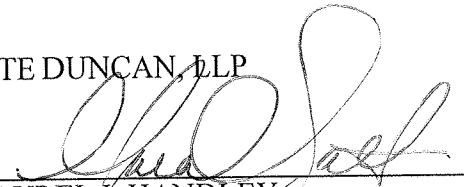
25 **JOINDER TO 1) NOTICE OF MOTION
AND MOTION BY PNC BANK, N.A. TO
DISMISS PLAINTIFF'S COMPLAINT;
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT; AND 2)
REQUEST FOR JUDICIAL NOTICE**

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28 Defendant, CLEAR RECON CORP. ("Defendant"), by and through its attorneys, Laurel
I. Handley, Esq. and Mara E. Satterthwaite, Esq., of Pite Duncan, LLP, respectfully submits its
joinder to Defendant, PNC Bank, N.A. d/b/a PNC Mortgage's, Motion to Dismiss Plaintiff's
Complaint [Dkt. #6] and Request for Judicial Notice in Support of Motion to Dismiss [Dkt. #7],
filed on April 8, 2015, in the above-captioned matter. Defendant hereby joins in arguments I-IV,
and VII-X, presented by moving Defendant as to why Plaintiff's Complaint, and each of its
causes of actions alleged as to CLEAR RECON CORP, fails to state a claim upon which relief
may be granted. Each of the specified arguments in the Motion to Dismiss applies with the same
force and effect as to Defendant. Thus, Defendant specifically incorporates and adopts those
arguments here, which provide the Court with a proper basis upon which to dismiss the
Plaintiff's Complaint, with prejudice, pursuant to FRCP 12(b)(6).

1 For all of the reasons stated in the Motion to Dismiss, as well as herein, and pursuant to
2 the supporting papers and exhibits accompanying the Request for Judicial Notice, it is
3 respectfully submitted that the Court dismiss Plaintiff's Complaint without granting leave to
4 amend.

5 Dated this 21 day of April, 2015.

6 PITE DUNCAN, LLP

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8 LAUREL I. HANDLEY
9 MARA E. SATTERTHWAITE
10 Attorneys for Defendant

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CERTIFICATE OF SERVICE

I, the undersigned, declare: I am, and was at the time of service of the papers herein referred to, over the age of 18 years, and not a party to this action. My business address is 520 South Fourth Street, Suite 360, Las Vegas, Nevada 89101.

I hereby certify that on April 21, 2015, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

8 Andrew A. Bao, aabao@wolfewyman.com

I further certify that on April 21, 2015, I served the above-described documents by U.S.
Mail on the following, who are not registered participants of the CM/ECF System:

Luz Aquino
395 Wigwam Avenue
Las Vegas, Nevada 89123

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed this 21 day of April, 2015, at Las Vegas, Nevada.

Nicole Lane
NICOLE L. LANE